

T T M A

RSPA-1993-12663

Tank Conference

TRUCK TRAILER MANUFACTURERS ASSOCIATION
1020 Princess Street - - - - Alexandria, Virginia 22314

RICHARD P. BOWLING
PRESIDENT

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December 20, 1993

Ms. Rose McMurray
Administrator
Office of Hazardous Materials Transportation (DHM-1)
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

Subject: Minimum Thicknesses Mandated by 49 CFR 172.101
Special Provisions B30 and B32

Dear Ms. McMurray:

We respectfully request your office to amend the minimum thickness values contained within 49 CFR 172.101 special provisions B30 and B32 to be consistent with the intent of the proposed minimum thickness table within 49 CFR 180.407(i). Namely, we petition that a 10% tolerance be afforded to DOT specification tanks conforming with the above special provisions.

Accordingly, we propose that your office amend 49 CFR 172.101 special provisions B30 and B32, where brackets indicate deletions and underlining indicates additions, to read as follows:

B30 Thickness of stainless steel for tank shell and heads for cargo tanks and portable tanks must be the greater of [(7.62 mm (0.300 inch)) 6.86 mm (0.270 inch) or the thickness required...

B32.... Thickness of stainless steel for tank shell and heads for cargo tanks and portable tanks must be the greater of [6.35 mm (0.250 inch)] 5.72 mm (0.225 inch) or the thickness required...

The above proposed amendments would be consistent with your precedent of specifying low-end-of tolerance thicknesses instead of nominal gauge thicknesses. For example, 49 CFR 178.347-2 Table I and II specifies a minimum thicknesses for newly manufactured cargo tank steel bulkheads and shells for a volume capacity of 10 gallons per inch or less and a lading density of 10 to 13 pounds per gallon of 0.129 inch instead of the nominal thickness of 10 gauge steel of 0.135 inch. An out of service minimum

Ms. Rose McMurray

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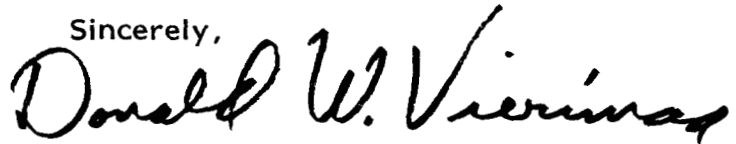
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thickness for this example would be 0.121 inches as proposed in Docket HM-183C; Notice No. 93-7 as published in the March 3, 1993 Federal Register.

If you do not act favorably on this petition, tank trailer manufacturers will have to purchase steel to the next higher nominal thickness (5/16 inch instead of 1/4 inch, and 3/8 inch instead of 5/16 inch) resulting in significant weight gains, cost increases, and payload decreases.

We thank you for your consideration of this petition. Please contact us if we can elaborate on our proposal or answer any questions you have.

Sincerely,

A handwritten signature in black ink, reading "Donald W. Vierimaa". The signature is written in a cursive style with a large, stylized "D" and "V".

Donald W. Vierimaa
Vice President-Engineering

DWV/mm

cc: Tank Conference Engineering Committee